

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DIRECT TESTIMONY
OF
HARRY J. BUCKEL
ON BEHALF OF THE
SATURATION MAIL COALITION

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TESTIMONY OF HARRY J. BUCKEL

AUTOBIOGRAPHICAL SKETCH

1 My name is Harry J. Buckel. I am Chief Executive Officer of Newport Media,
2 Inc., the publisher of several shopper publications in Long Island, New York. I
3 have held this position since 1996 when I purchased the company. I have been
4 involved in the community newspaper and advertising shopper industry for over
5 twenty years.

6 I received a BSBA Finance from Xavier University in 1966 and an MS degree
7 in Regional Economics from Michigan State University in 1970.

8 From 1970-72, I served as Assistant to the President and Vice President for
9 Finance and Development for the Michigan Chamber of Commerce.

10 From 1972-1978, I held several management positions for the Panax
11 Corporation involving the publication of various community newspapers:

12 Director of Marketing;

13 General Manager of the Community News of Suburban Detroit
14 (100,000 circulation);

15 Group Vice President, Southeast Michigan Newspapers;

16 Vice President, Corporate Staff and Assistant to the President;

17 Vice President, Publisher of the Miami Beach Sun Reporter

18 I joined Harte-Hanks Communications, Inc. in 1978 and served in the
19 following positions prior to becoming President of the PennySaver, a Harte-Hanks
20 shopper in Southern California:

21 President and Publisher, San Francisco Progress

22 President and Publisher, Ypsilanti Press

23 President and Publisher, Gloucester County Times

1 President and Publisher, Journal Publishing Company, Hamilton,
2 Ohio

3 In 1982, I became Publisher of the PennySaver, a position I held until 1996 when I
4 left the company to form Newport Media, Inc. In addition, I served as a Corporate
5 Vice President and Senior Vice President of Harte-Hanks Communications (1986-
6 1996; 1991-96) and President of Harte-Hanks Shoppers (1987-1996).

7 Throughout my career, I have participated actively in advertising and
8 shopper industry affairs. In 1989, I served as Industry Co-Chairman of the
9 Postmaster General's Worksharing Task Force. I served as Executive Vice
10 Chairman of the Third Class Mail Association from 1989 to 1991, and as
11 Chairman of the Advertising Mail Marketing Association from 1991 through 1993.
12 In addition, I presented testimony to the Postal Rate Commission on behalf of
13 Harte-Hanks Shoppers in Dockets R90-1 and R94-1. Recently, I have been
14 involved in forming and organizing the Saturation Mailers Coalition, working closely
15 with other saturation mailers.

PURPOSE OF TESTIMONY

1 I am testifying on behalf of the Saturation Mailers Coalition, a recently-
2 formed coalition of local, regional, and national companies involved in the
3 saturation mail advertising business. The Coalition supports the Postal Service's
4 proposed rates and rate structure for Standard A Enhanced Carrier Route (ECR)
5 Mail. The purposes of my testimony are to:

- 6 • Describe the Saturation Mailers Coalition and the characteristics of its
7 members;
- 8 • Describe the nature of the saturation mail advertising market and the
9 customers our industry serves, particularly the many small businesses
10 that use and depend upon saturation mail to reach their customers;
- 11 • Describe the highly competitive nature of our business, particularly in
12 relation to non-postal competition;
- 13 • Explain the importance to our industry and our customers of maintaining
14 affordable postal rates for saturation mail, and the benefits of the Postal
15 Service's proposal to moderate the current high pound rate for ECR
16 mail.

17 In addition, my testimony describes the operation of Newport Media Inc.,
18 including its production and distribution; the markets it serves, its customers and
19 competitors; and the significance and growing success of alternate delivery in our
20 markets.

THE SATURATION MAIL COALITION

22 I have long believed that mailers in the saturation mail industry, despite
23 being competitors with one another, have strong common interests on postal
24 issues, both as an industry and as representatives of our small business
25 advertising customers. Over the last several years, I and other leaders in the

1 industry have informally discussed the idea of forming a coalition to cooperate and
2 participate in postal matters of mutual interest. These discussions ultimately led
3 to a meeting of industry representatives earlier this year and formation of the
4 Coalition. The Coalition is co-chaired by Norman Schultz, President and CEO of
5 Mail Marketing Systems in Jessup, Maryland, and Richard Mandt, owner of The
6 Flyer in Tampa, Florida.

7 Currently the Coalition has 36 members, listed in the appendix to my
8 testimony. The membership reflects the diversity of the industry. It includes
9 publishers of free community papers and shopper publications, shared mail
10 programs, companies that also do solo saturation mailings, and organizations
11 whose members are primarily interested in saturation mail issues. Although
12 many of the members operate programs that are 100% mailed, a number also
13 distribute a portion of their circulations via private delivery. The diversity is also
14 reflected in the sizes of the members' programs and their markets, ranging from
15 large national or regional mailers like Advo and Harte-Hanks who serve major
16 metropolitan markets and provide total weekly circulation to millions of
17 households, down to small local mailers like the Antigo Shoppers Guide in Antigo,
18 Wisconsin who serve rural markets with weekly circulation to less than 20,000
19 households.

20 THE SATURATION MAIL INDUSTRY

21 From my experiences with Harte-Hanks, mailer trade associations, and
22 prior postal cases, I am aware of the common misperception that the saturation
23 mail industry consists of only a few large mailers. In fact, the industry has a great
24 diversity of companies offering a variety of mailing programs that, in total, reach
25 virtually every household in the nation. The industry serves hundreds of thousands
26 of advertisers, including not only large national retailers but predominantly small
27 local businesses and individual entrepreneurs throughout the nation.

1 There are more than a thousand local and regional free community papers
2 and shopper publications in the United States, serving over 50 million
3 households. Roughly half are distributed by mail, and of those, virtually all are
4 mailed at Enhanced Carrier Route rates. Although many of these are 100 percent
5 advertising publications, many, like ours, contain local community news, free
6 announcements, and other non-advertising reader services and editorial matter.
7 These publications typically have a newspaper tabloid or booklet format, and many
8 also carry preprint advertising inserts.

9 The saturation mail industry also includes many saturation shared mail
10 programs. While Advo is the largest of these, with programs in major metropolitan
11 markets, there are a number of others that serve local or regional markets
12 throughout the country. In addition, there are a number of saturation coupon
13 programs serving local markets, either independently or through regional or
14 national franchise programs.

15 Regardless of the type or size of their programs, all saturation mailers
16 share many common market characteristics:

- 17 • The focus of all saturation mail programs, even those of regional or
18 national companies, is on individual local markets.
- 19 • All are geared toward serving local retailers, service businesses, and
20 other advertisers who need to reach potential consumers who reside
21 near their stores or businesses, typically within a radius of 2-5 miles.
- 22 • The primary advertising appeal of saturation mail programs is for goods
23 and services with potential appeal to a broad segment of consumers,
24 such as groceries, fast food, local retailers, auto sales and services, and
25 home-related services.
- 26 • Small local business advertisers are an essential element of saturation
27 mailers' success, and vice versa.
- 28 • All operate in a highly competitive market, competing with each other,
29 and with newspapers and private delivery companies for distribution of
30 retail preprint inserts.

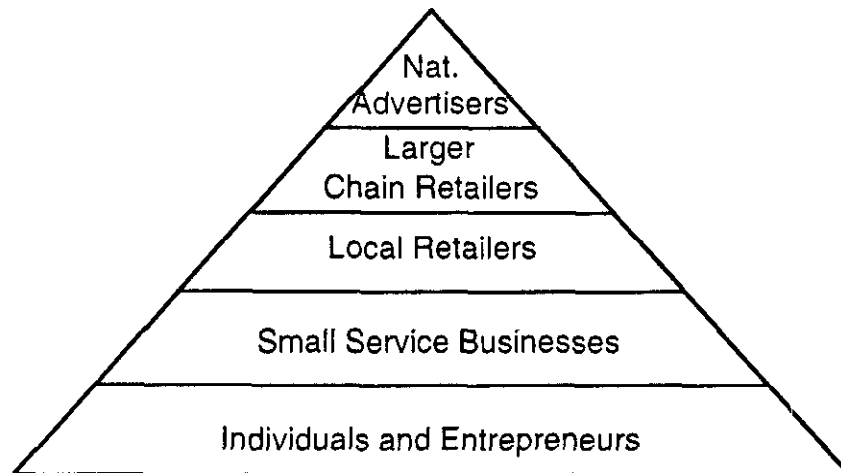
- 1 • Saturation mail programs are mailed on a regular, predictable schedule,
2 usually weekly or monthly, and are highly workshared.
- 3 • Postage is typically their largest single cost item, and affordable postage
4 rates play an important role in their ability to survive and grow.

5 The essential common element of saturation mail programs is that they
6 offer accessible advertising targeted by geographic area, at affordable prices, to
7 small local businesses that do not have cost-effective media alternatives. For
8 many small businesses, the cost of advertising is second only to the owner's draw
9 as a cost of doing business. Saturation mail is a vital component for small
10 businesses that need to advertise their goods and services.

11 **SATURATION MAIL CUSTOMERS**

12 Saturation mail customers represent a wide range and size of businesses.
13 They include a mixture of many small local service and retail businesses who
14 have limited advertising resources and alternatives; and larger regional or national
15 chains who have a number of competitive alternatives for distribution of preprint
16 inserts, or even non-print media. While the precise mix of advertisers will vary from
17 one saturation mailer to another, depending on the nature of its program and the
18 specific markets it serves, this blending of large and small business advertisers is
19 characteristic of saturation mail programs.

20 The customers that use saturation mail, regardless of size, all have a
21 common objective: to reach consumers that live near their businesses. The
22 makeup of these customers is quite diverse, but consists predominantly of small
23 local businesses. If viewed as a pyramid, the foundation of saturation mail is
24 individual service providers, entrepreneurs, and small "mom and pop" service
25 businesses that constitute 60 to 80 percent of all saturation mail users:



1 The next tier is small to mid-size local retailers, such as local grocers, fast food
2 and restaurants, hardware, and auto dealers and services, that comprise 15 to 20
3 percent of all saturation mail users. Larger chain retailers, both regional and
4 national, constitute 5 to 10 percent of saturation mail users, but because of their
5 broad advertising coverage and frequency they are often critical to the success of a
6 saturation mail program. The final category of saturation mail users, comprising
7 perhaps less than one percent of total saturation advertisers, is national
8 advertisers, primarily food and consumer product manufacturers using the mail to
9 distribute coupons.

10 The small business focus of saturation mail is reflected in Newport Media's
11 programs. The core of our business is the small retailer/service provider/
12 *individual entrepreneur trying to sell goods or services in a limited geographic*
13 *area around a single location.* The majority of our ads are mailed to five or fewer
14 zones (less than 60,000 households), reflecting the fact our advertisers are
15 typically small businesses.

16 In a typical week, a single zoned edition of our book will carry over 600
17 advertisements, adding up to more than 12,000 ads weekly across all our zones.
18 Although display ads account for more than half of the pages in our books, they
19 represent less than 20% of our total advertisers. Even our full-page display

1 advertisers tend to be independent local businesses such as neighborhood
2 grocery stores and car dealers, rather than national chain stores. Our partial-page
3 display advertisers are even smaller businesses, like local home improvement
4 contractors, dry cleaners, and auto repair businesses.

5 The smallest of our customers -- classified advertisers -- account for more
6 than 80% of the ads we carry. Our classified ads include employment, real estate,
7 auto, personals, and our largest single advertising category, service businesses
8 and small entrepreneurs. This latter category is a small business potpourri: lawn
9 and garden services, gutter, window and chimney cleaning, tree services, trash
10 hauling, moving and storage, professional services, and every variety of home
11 improvement and repair services from general contractors to handymen. Many of
12 these ads are from the smallest of small businesses, individuals like a one-truck
13 trash hauler whose livelihood depends on business generated by ads in our
14 publication.

15 **NEWPORT MEDIA INC. - SHOPPERS**

16 Newport Media Inc. was formed in August of 1996. We are located in a
17 single plant in Hicksville, New York, with five sales and marketing locations
18 throughout the market area, currently employing over 650 people. We have now
19 acquired six publications, five of which are home-delivered, saturation-targeted
20 shoppers. Four of those publications are mailed, one is delivered by hand. Our
21 publications reach over 2 million households weekly, of which 1.6 million are
22 mailed. Our total annual mail volume is over 80 million, all mailed at Enhanced
23 Carrier Route saturation rates.

24 Our shopper publications are local saturation advertising booklets mailed
25 (and in some cases hand delivered) to 2 million addresses in the New York
26 Metropolitan and Southern New Jersey markets, reaching approximately 98% of

1 the homes in the areas served. Our market covers Nassau and Suffolk Counties
2 on Long Island, Brooklyn, Staten Island in New York, and the counties of
3 Burlington, Camden and Gloucester in southern New Jersey, across from
4 Philadelphia.

5 Our market is divided into 150 zones. Each zone contains approximately
6 12,000 residences. A separate and unique book is printed for each zone each
7 week. An advertiser can choose to run an ad in any one zone, any combination of
8 zones, or all 150 zones.

9 The content of our books is about 90% advertising, with 10% devoted to free
10 community announcements, personal financial advice and history columns,
11 horoscope, crossword and other puzzles, and reader contests. Advertising is in
12 the form of display ads (picture ads) or reader ads (comparable to classified ads).
13 The mailed books measure 11 x 7 inches and average 68 pages, with an average
14 weight of about 2.6 ounces. Preprinted advertising circulars, commonly called
15 "retail preprints" or "preprint inserts," are also inserted in the books. We average
16 about 3 to 4 preprint inserts per book, mostly light-weight 1-4 page inserts from
17 local or regional advertisers.

18 Our operations begin with the solicitation of advertisements by our sales
19 force. We then prepare the graphics and layout work to design each zoned version
20 of the books, and do our own printing. The books then go to the distribution area
21 of our plant where the appropriate preprint inserts for each zone are inserted. The
22 books are then strapped in bundles of 25, each with a facing slip denoting the
23 carrier route number, the bundle number, and the total number of bundles and
24 pieces for the route. The bundles are placed on wheeled containers as required
25 by the Postal Service. Trays of carrier walk sequenced detached address labels
26 for each zone are placed with the corresponding containers, together with a
27 placard containing identifying information required by the Postal Service. We then

1 truck the mail directly to the destination post offices, stations and branches for
2 delivery, using our own transportation.

3 The services that we provide go far beyond simply taking an order for
4 advertising and producing mailings. The great majority of our customers, due to
5 their small size and limited resources, have little or no advertising or marketing
6 expertise. We work closely with them to define their marketing needs and
7 objectives, to target their advertising coverage and frequency, and to design their
8 ads to maximize effectiveness and response.

9 First, we help our customers understand and define their targeted
10 marketing zones. We look at the nature of the customer's business in relation to
11 advertising needs. We review the customer's sales records to determine the
12 areas where most of its past business has come from, and recommend ways of
13 obtaining additional sales data such as recording address or ZIP code information
14 from sales. We use maps and demographic data by zone to identify the primary
15 marketing area surrounding the customer's business location, matching the
16 customer's business characteristics to demographic data, and taking into account
17 other factors such as locations of the customer's competitors and areas for
18 potential market expansion.

19 Second, we help to design an advertising program tuned to the customer's
20 needs and resources. A lawn service with a seasonal business, for example, may
21 require different ad frequencies and messages during the year, and we will even
22 recommend additional services that they might offer and advertise during the off-
23 season, such as leaf, mulching, and winter landscaping/cleanup services. For a
24 small painting business that needs a steady stream of jobs, we may recommend
25 a less expensive but weekly classified ad rather than a more expensive monthly
26 display ad. Conversely, for a construction contractor that does larger projects, the
27 monthly display ad may be the better choice.

1 Third, we help our customers create a strong advertising message to
2 consumers that will drive a good response. In the case of a shoe store that was
3 offering small discounts on selected shoes, we showed them that a stronger offer
4 of "\$10 off on any shoes" would generate greater sales. For a tire store whose
5 ads focused on sales of low-margin tires, we showed that advertising specials on
6 their much higher-margin car services (oil changes and lube jobs) would generate
7 higher profits. For a small grocer whose ads offered modest specials, we showed
8 how offering super-bargain prices on selected items could generate more store
9 traffic and sales. For a restaurant with a successful evening dinner business, we
10 showed that advertising "early bird" specials for its off-peak 5-7pm period would
11 generate business from senior citizens and price-conscious diners without
12 diminishing their evening business.

13 Like all saturation mail programs, we know that our success as a business
14 is linked to the success of our customers, and vice versa. The more affordable
15 and effective their advertising is, the better their chances are to survive and grow
16 as a business, and to continue or expand their use of saturation mail advertising.

17 THE NEED FOR AFFORDABLE SATURATION MAIL ADVERTISING

18 Over my years in the saturation mail business, I gained a growing
19 appreciation for the importance of affordable saturation advertising for small
20 businesses. Now that I am running my own company, I have more contact with
21 our customers and have seen even more closely how critical our form of
22 advertising can be to the small business person or struggling entrepreneur. Many
23 of our advertisers are one-person service businesses like the gutter cleaner or the
24 handyman, or the entrepreneur trying to get started. These are not "pinstripe and
25 briefcase" entrepreneurs, but hard working people trying to make a living. Their
26 modest business is their primary or sole source of income. For them, effective

1 advertising can be the difference between success or failure, and the term
2 "affordable" advertising has a real pocketbook meaning.

3 Unlike larger businesses with multiple locations, high sales volumes,
4 substantial advertising budgets, and advertising competitors clamoring for their
5 business, the great majority of our customers have limited advertising choices.
6 Broad coverage mass media like television and radio may work for the large
7 retailer with stores through the market area, but not for the typical small business
8 whose potential customers reside within a few miles of the store. Even the small
9 service provider needs to generate nearby customers, as the time lost in traveling
10 to jobs across the metro area increases costs and limits the number of jobs that
11 can be done in a day. Similarly, advertising in newspapers may only reach
12 subscribers, omitting an important segment of consumers, and may not be zoned
13 finely enough to match the business's primary market area.

14 Many of these individuals and small businesses need to advertise
15 frequently. The freelance plumber doing small jobs needs a steady flow of
16 customers, perhaps four or five each day. Every day without work is a day without
17 pay. The cost of advertising on a regular weekly or monthly basis becomes a
18 major financial decision. Our typical small commercial classified ad customer,
19 advertising weekly, may spend \$3,000 to \$4,000 annually. A business using our
20 small display ads may spend \$10,000 to \$12,000 annually. These are very
21 substantial amounts for such small businesses. For many of our customers, their
22 advertising expenditures with our publications are their single largest cost of doing
23 business.

24 In a broader sense, the ultimate customers of our mailing programs are
25 consumers. I know that our publications are highly valued by recipients. Based on
26 independent surveys, over 70 percent of adults in our New York market area read
27 our publication, a readership that is higher than our competitors. This readership

1 is also confirmed by the high response we get from recipients to various contests
2 and promotions that we run in our publications. The ultimate test of consumer
3 acceptance is advertising response. We know from our customers that
4 consumers do use and respond to the advertising in our programs. The
5 significant repeat business from our existing customers and growth from new
6 customers is the best indication of consumer responsiveness to our product.

7 The value to consumers goes beyond simply responding to ads. For value-
8 conscious consumers (which today encompasses far more than just lower and
9 middle-income households), saturation mail is an effective way to comparison
10 shop and find good values. It also offers consumers the benefit of finding goods
11 and services that are located in or near their neighborhoods, a convenience that
12 for many time-pressed consumers is as valuable as a bargain price.

13 SATURATION MAIL COMPETITION

14 Although small business advertisers are the heart of our publications, the
15 long-term viability of our industry and customers depends in large measure on the
16 extent to which we can compete for distribution of retail advertising preprints. The
17 competition for these larger, highly sought retail advertisers is fierce. Daily
18 newspapers, most of which offer total market coverage (TMC) programs to reach
19 nonsubscribers via mail or private delivery, are generally the dominant
20 competitors, although private delivery companies are also significant competitors
21 in a number of markets, including the New York and Philadelphia markets we
22 serve.

23 The single largest and dominant competitor for insert business in the
24 Boroughs of New York is Distribution Systems of America (DSA), a hand delivery
25 (alternate delivery) program which distributes to over 6 million households in the
26 New York Metropolitan area. Every major retail preprint customer in the market (K-

1 Mart, Sears, all retail food and drug, etc.) delivers their preprints to households in
2 the Boroughs of New York through this program, not in the mail. In fact, since the
3 1987 postal rate increase, there have been no weekly or monthly saturation mail
4 programs serving the New York City boroughs. This is a growing and vibrant
5 private delivery program and a significant threat to direct mail programs since its
6 cost is dramatically lower than the use of mail.

7 In the Philadelphia market, there is a combination of direct mail and hand
8 delivery (the hand delivery portion is growing) again offering significant cost
9 advantages to the advertiser, to the detriment of the mail. Like the New York
10 market, virtually all retail, food, drug and hard goods retailers inserts in the
11 Philadelphia market are delivered by a combination of hand delivery and mail. The
12 south Jersey market also has three suburban dailies, the Camden Courier Post,
13 the Gloucester County Times, and the Burlington County Times, as well as the
14 New Jersey edition of the Philadelphia Enquirer -- all with strong TMC programs.

15 **THE NEED FOR A LOWER, MORE REASONABLE POUND RATE.**

16 The cost disadvantage of mail distribution vis-a-vis newspaper or hand-
17 delivery services is due largely to the current rate structure for Enhanced Carrier
18 Route mail, specifically the high pound rate above the 3.3-ounce breakpoint.
19 Under current rates for Saturation ECR mail, postage for pieces above the
20 breakpoint increases in a direct 1-to-1 ratio with increased weight, with postage
21 doubling as the weight doubles. Although I am not a postal costing expert, I
22 cannot imagine that postal handling costs above the breakpoint are purely weight-
23 related, or even anywhere near the steep slope of the current pound rate.

24 The effect of this high pound rate on our ability to compete for inserts is
25 dramatic. Unlike preprint insert rates of our non-postal competitors that increase
26 only moderately as preprint weight increases, rates for mailed inserts must

1 increase steeply with weight to cover the high linear pound rate postage cost. The
2 Postal Service's proposed pound rate will moderate, but not eliminate, this
3 disparity. For traditional retail preprints, such as a 2-or-more-ounce circular typical
4 of the major retail preprints carried in newspapers, even the lower pound rate
5 would still leave us priced out of the market. The lower pound rate, however,
6 would at least enable us retain the preprint business we currently have and help
7 us compete at the margin for some portion of the lighter-weight preprint business,
8 particularly under 1-ounce.

9 I know from discussions with others in the saturation mail industry that the
10 high pound rate is an impediment not only to attracting insert volumes but to
11 expanding circulation in existing and new markets. The ability to generate preprint
12 inserts is often a critical "go or no-go" factor in expanding or opening new markets.

13 I also believe that reduction of the pound rate to a more reasonable level will
14 encourage free community papers and shoppers and perhaps even newspaper
15 TMC programs that are currently hand delivered to consider returning to the mail.
16 Ironically, a number of shoppers and free community papers that use private
17 delivery previously used the mail, but were driven away by increased postal rates.
18 The 1987 postal rate increase, in particular, had a dramatic impact on the
19 saturation mail business. That increase caused the diversion of many previously-
20 mailed newspaper TMC programs and shoppers from the mail into private
21 delivery, and rapid growth of private delivery operations. Most if not all of the
22 programs that shifted to private delivery were those with piece weights above the
23 3.3-ounce breakpoint, where the high pound rate created an artificially high cost
24 spread between mail and hand delivery.

CONCLUSION

The Postal Service faces growing competition for many segments of its business, including saturation mail. In other segments, such as portions of First Class mail, the competition comes primarily from new communications technologies that offer greater speed or convenience, where price is less likely to be a decisive factor. In the case of saturation mail, the competition is a function of postal pricing.

The Postal Service's future in the saturation mail market depends on postal pricing decisions. *The current saturation mail volumes and contribution cannot be taken for granted.* Without affordable rates that allow mailers to compete in the marketplace, the Postal Service risks losing this price sensitive volume to newspaper competitors and to new or expanded private delivery operations. Existing mailers may also be forced to shift to private delivery, just as occurred following the Docket R87 rate increase. With affordable rates, saturation mail growth from existing mailers, and from former mailers that previously switched to private delivery due to increased postal rates (particularly the high pound rate), can offset declines in other volumes due to changes in communication technology.

On behalf of the Saturation Mail Coalition and the hundreds of thousands of businesses and individuals that use saturation mail advertising, I urge the Commission to recommend rates that will enable saturation mail to remain a vital and competitive advertising medium.

Saturation Mail Coalition Members

Mail South, Inc.	Helena, AL 35080
Arizona Pennysaver Group	Tempe, AZ 85281
Tucson Shopper	Tucson, AZ 85745
Harte-Hanks Shoppers	Brea, CA 92621
ValuMail, Inc.	Hartford, CT 06103
ADVO, Inc.	Windsor, CT 06095
The Flyer	Tampa, FL 33619
Today's Advantage	Alton, IL 62002
PennySaver Publications	Tinley Park, IL 60477
National Mail It	Shreveport, LA 71118
Action Unlimited	Concord, MA 01742
Berkshire Penny Saver	Lee, MA 01238
Market America Corporation	Baltimore, MD 21244
Impulse Publications	Bel Air, MD 21050
The Maryland Pennysaver	Hanover, MD 21076
Mail Marketing Systems, Inc.	Jessup, MD 20794
Target Marketing Maine, Inc.	Rockland, ME 04841
Metro Marketing Associates	Eagan, MN 55121
Alliance of Independent Store Owners and Professionals	Minneapolis, MN 55402
Advertising Preprint Distributors	Jackson, MS 39289

Saturation Mail Coalition Members

Advantage Mail Network	Charlotte, NC 28208
PAGAS Mailing Service, Inc.	Tarboro, NC 27886
Focus On Results	Weddington, NC 28173
Eastern Marketing Services	Durham, NH 03824
Target Direct NH, VT	North Havehill, NH 03774
Independent News	Pompton Lakes, NJ 07442
Decker Advertising, Inc.	Delhi, NY 13753
Newport Media	Hicksville, NY 11801
Yorktown Pennysaver Group	Yorktown Heights, NY 10598
Rural Advertising Mail	Philadelphia, PA 19134
Market Select Inc.	Reading, PA 19605
The Reminder	Coventry, RI 02816
CAP Medica Network	Memphis, TN 38018
Coupon Concepts	Waco, TX 76702
Winmill Publishing Corp.	Brattleboro, VT 05302
Antigo Area Shoppers Guide	Antigo, WI 54409

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Thomas W. McLaughlin

December 30, 1997